Occupational Safety and Health Administration 9100 Bluebonnet Centre Blvd. Suite 201

Baton Rouge, LA 70809

Phone: 225-298-5458 Fax: 225-298-5457



# Citation and Notification of Penalty

To:

Graphic Packaging International, Inc. 1070 JONESBORO ROAD West Monroe, LA 71294

**Inspection Site:** 1070 JONESBORO ROAD West Monroe, LA 71294 **Inspection Number:** 983594

Inspection Date(s): 06/25/2014 - 12/09/2014

**Issuance Date**: 12/19/2014

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you either call to schedule an informal conference (see paragraph below) or you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest — You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. <u>Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.</u>

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to "DOL-OSHA". Please indicate the Inspection Number on the remittance. You can also make your payment electronically on <a href="https://www.pay.gov">www.pay.gov</a>. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on OSHA Penalty Payment Form. The direct link is:

#### https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$50,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

**Notification of Corrective Action** – For each violation which you do not contest, you must provide abatement certification to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that abatement documentation is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

**Employer Discrimination Unlawful** – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

**Notice to Employees** – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

## U.S. Department of Labor Occupational Safety and Health Administration



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued or	n
12/19/2014. The conference will be held by telephone or at the OSHA office located at 910	0
Bluebonnet Centre Blvd., Suite 201, Baton Rouge, LA 70809 on	ıt
Employees and/or representatives of employees have a right to attend a	n
informal conference.	

#### CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

**Inspection Number: 983594** 

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

Issuance Date: 12/19/2014

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: U.S. Department of Labor – Occupational Safety and Health Administration, 9100 Bluebonnet Centre Blvd., Suite 201, Baton Rouge, LA 70809

	was corrected on
	was corrected on
I certify that the information contained in the representatives have been informed of the a	his document is accurate and that the affected employees and their
Signature	Date
Typed or Printed Name	Title

**NOTE: 29 USC 666(g)** whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 1 Type of Violation: Serious

29 CFR 1910.23(c)(3): Regardless of height, open-sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units, and similar hazards were not guarded with a standard railing and toe board.

- a) The employer did not ensure that platforms above or adjacent to dangerous equipment were guarded with a standard railing. This violation occurred on or about June 25, 2014, when employees were accessing the platforms over printing presses that were not guarded with standard railing on the askew section of press #5.
- b) The employer did not ensure that platforms above or adjacent to dangerous equipment were guarded with a standard railing. This violation occurred on or about June 25, 2014, when employees were accessing the platforms over printing presses that were not guarded with standard railing on the stacker section of press #7.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

**Issuance Date: 12/19/2014** 



#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 2 Type of Violation: Serious

29 CFR 1910.141(a)(3)(ii): Floor(s) of workroom(s) were not maintained, so far as practical, in a dry condition:

a) The employer did not ensure the floor was maintained in a dry condition. This violation occurred on about July 1, 2014, near the palletizer on the south west side of the facility where employees were operating a palletizer and the floor was wet with water due to a damaged roof.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 3 Type of Violation: Serious

29 CFR 1910.147(c)(5)(i): Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware were not provided by the employer for isolating, securing or blocking of machines or equipment from energy sources:

a) The employer did not ensure that locks or other hardware were provided to employees for isolating, securing or blocking of machines or equipment from energy sources. This violation occurred on or about 07/08/2014, when there was no lockout devices provided for the gas valves to the press #9 dryers.

#### ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 4 Type of Violation: Serious

29 CFR 1910.147(c)(6)(i): The employer did not conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirement of this standard were being followed:

a) The employer did not ensure that periodic inspections of the energy control procedures were conducted at least annually to ensure that the procedures and the requirement of this standard were being followed by the employees. This violation occurred on or about 07/08/2014, when employees were conducting lockout tagout on specific equipment assigned to them without annual periodic inspections by the employer to verify that employees were following the procedures.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

Proposed Penalty:

01/01/2015 \$7000.00

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 5 Type of Violation: Serious

29 CFR 1910.147(c)(7)(i)(B): Each affected employee was not instructed in the purpose and use of the energy control procedures.

a) The employer did not ensure that each affected employee was instructed in the purpose and use of This violation was documented on or about 07/08/2014, when the energy control procedures. employees were conducting maintenance on press #4 and the operators (affected employees) had not been trained on the energy control procedure for the press.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

Citation 1 Item 6 Type of Violation: Serious

29 CFR 1910.147(c)(9): The employer or authorized employee did not notify affected employees before the lockout or tagout devices were applied to the machine or equipment:

a) The employer or authorized employee did not notify affected employees before the lockout or tagout devices were applied to the machine or equipment. This violation occurred on or about 07/08/2014, when employees were conducting lockout on press #4 and the affected employees were not notified that the energy sources were isolated, and rendered inoperative.

#### ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

**Issuance Date: 12/19/2014** 



#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

Citation 1 Item 7 Type of Violation: Serious

29 CFR 1910.147(d)(4)(i): Lockout or tagout devices were not affixed to each energy isolating device by authorized employees:

a) The employer did not ensure that lockout devices were affixed to each energy isolating device by This violation occurred on or about 07/08/2014, when employees were authorized employees. conducting lockout on press #4 using a cable that did not ensure the isolation of the energy sources of all four (4) disconnects.

#### ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

## Citation 1 Item 8 a Type of Violation: Serious

29 CFR 1910.269(a)(2)(i)(A): Employees were not trained in nor were they familiar with the safetyrelated work practices, safety procedures, and other safety requirements that pertained to their respective job assignments:

a) The employer did not ensure that employees were trained and familiar with the safety-related work practices, safety procedures, and other safety requirements that pertained to their respective job assignments. This violation occurred on or about 07/01/2014, where two employees where required to access an outside substation and were not trained and familiar with safety related work practice to do their job assignment.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 8 b Type of Violation: Serious

29 CFR 1910.269(u)(4)(iii): Unqualified persons may not enter the rooms or other spaces while the electrical supply lines or equipment were energized:

a) The employer did not ensure that unqualified persons may not enter rooms or other spaces while the electrical supply lines or equipment were energized. This violation occurred on or about 07/01/2014, where two employees where required to access an outside substation and were not qualified to enter the rooms or other spaces while the electrical supply lines or equipment were energized.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

01/01/2015

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 9 Type of Violation: Serious

29 CFR 1910.269(u)(4)(v): The employer did not keep each entrance to a room or other space locked, unless the entrance was under the observation of a person who was attending the room or other space for the purpose of preventing unqualified employees from entering:

a) The employer did not ensure that an electrical distribution center surrounded by a fence was controlled by lock and key or other means which restricted access to only qualified persons. This violation occurred on or about 07/01/2014, where access to an outside substation was not secured to prevent unauthorized employees or visitors.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

**Issuance Date:** 12/19/2014



#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

Citation 1 Item 10 Type of Violation: Serious

CFR 1910.303(f)(2): Each service, feeder, and branch circuit, at its disconnecting means or overcurrent device, was not legibly marked to indicate its purpose, nor located and arranged so the purpose was evident:

a) The employer did not ensure each branch circuit, at its disconnecting means or overcurrent device, was legibly marked so the purpose was evident. This violation occurred on or about 06/25/2014, where employees were operating electrical equipment at the facility with a breaker box having individual breakers not legibly marked to indicate their purpose for disconnecting power.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number: 983594** 

**Issuance Date:** 12/19/2014



#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 1 Item 11 Type of Violation: Serious

29 CFR 1910.305(g)(2)(iii): Flexible cords and cables were not connected to devices and fittings so that strain relief was provided that would prevent pull from being directly transmitted to joints or terminal screws:

- a) The employer did not ensure flexible cords and cables were connected to devices and fittings so that strain relief was provided that would prevent pull from being directly transmitted to joints or terminal screws. This violation occurred on or about 07/08/2014, where employees were operating ink pumps connected to printing carts 3, 4, 5, 6, 7, and 8 of printing press #6 with improper cord strain relief to the motor housings.
- b) The employer did not ensure flexible cords and cables were connected to devices and fittings so that strain relief was provided that would prevent pull from being directly transmitted to joints or terminal screws. This violation occurred on or about 07/08/2014, where employees were operating ink pumps connected to printing carts 3, 4, 5, 6, 7, and 8 of printing press #7 with improper cord strain relief to the motor housings.

## ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

Occupational Safety and Health Administration Inspection Date(s): 06/25/2014 - 12/09/2014

**Inspection Number:** 983594

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#### Citation and Notification of Penalty

Company Name: Graphic Packaging International, Inc.

Inspection Site: 1070 JONESBORO ROAD, West Monroe, LA 71294

## Citation 2 Item 1 Type of Violation: Other-than-Serious

- 29 CFR 1910.37(b)(6): Each exit sign was not illuminated to a surface value of at least five footcandles (54 lux) by a reliable light source and be distinctive in color:
- a) The employer did not ensure each exit sign was illuminated by a reliable light and be distinctive in color. This violation occurred on or about June 25, 2014, when employees were exiting the main break room adjacent to the plant manager's office at the facility with the exit signs not illuminated.
- b) The employer did not ensure each exit sign was illuminated by a reliable light source and be distinctive in color. This violation occurred on or about June 25, 2014, when employees were exiting the main office building entrance at the facility with the exit signs not illuminated.

#### ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: Proposed Penalty:

01/01/2015

\$0.00

**Dorinda Folse** Area Director

Dunda Tol

Occupational Safety and Health Administration 9100 Bluebonnet Centre Blvd. Suite 201

Baton Rouge, LA 70809

Phone: 225-298-5458 Fax: 225-298-5457



# INVOICE / DEBT COLLECTION NOTICE

**Company Name:** 

Graphic Packaging International, Inc.

**Inspection Site:** 

1070 JONESBORO ROAD, West Monroe, LA 71294

**Issuance Date:** 

12/19/2014

**Summary of Penalties for Inspection Number** 

983594

Citation 1, Serious

\$55000.00

Citation 2, Other-than-Serious

\$0.00

TOTAL PROPOSED PENALTIES

\$55000.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on <a href="www.pay.gov">www.pay.gov</a>. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on <a href="OSHA Penalty Payment Form">OSHA Penalty Payment Form</a>. The direct link is <a href="https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334">https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334</a>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$50,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

<u>Interest</u>: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

**Delinquent Charges**: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.

**Dorinda Folse** 

Area Director